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Via ECF

The Honorable Sarah Netburn
Magistrate Judge, United States District Court
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

November 15, 2017

In re Terrorist Attacks of September 11, 2001, 03 MDL 1570 (GBD)(SN):

Dear Judge Netburn,

The Defendants' Executive Committee ("DEC"), on behalf of the Defendants, and the Plaintiffs' Executive Committees (PECs), on behalf of all plaintiffs, respectfully submit their revised joint draft Deposition Protocol pursuant to the Court's Order (Dkt. 3716).

The parties have conferred at length concerning draft Deposition Protocol revisions in light of this Court's rulings and guidance. As a result of these efforts, we have reached agreement on most provisions.

We were, however, unable to reach agreement regarding limitations on the number of depositions and two issues related to Discovery Depositions and Depositions to perpetuate testimony. For the Court's convenience, we have identified these areas of disagreement in three red boxes within the attached draft, in which we have identified the topic in issue, and provided concise statements of each side's position.

We thank Your Honor for the Court's attention to this matter.

Sincerely,

/s/ Steven T. Cottreau

Steven T. Cottreau

cc: MDL-1570 Counsel of Record (via ECF)